

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

## WSOU INVESTMENTS, LLC

VS.

Case No.: 6:20-CV-474-ADA

DELL TECHNOLOGIES INC., ET AL.

## **MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Venus Allahyazdeh, applicant herein, and

moves this Court to grant admission to the United States District Court for the Western District of

Texas pro hac vice to represent Dell Technologies Inc., Dell Inc., and EMC Corp. in this case,

and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of) Gibson Dunn & Crutcher LLC with offices at: \_\_\_\_\_  
Mailing address: 200 Park Ave. \_\_\_\_\_  
City, State, Zip Code: New York, NY, 10166 \_\_\_\_\_  
Telephone: 212-351-4000 Facsimile: \_\_\_\_\_

2. Since 2018, Applicant has been and presently is a member of and in good standing with the Bar of the State of New York.  
Applicant's bar license number is 5587886.

3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
New York Supreme Court	2/26/2018
Southern District of New York	4/14/2020

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

5. I  have  have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Barry K. Shelton

Mailing address: 311 RR 620S, Suite 205

City, State, Zip Code: Austin, TX 78734

Telephone: (512) 263-2165

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Venus Allahyazadeh to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Venus Allahyazadeh

[printed name of Applicant]



[signature of Applicant]

#### CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 4th day of October, 2020.

Venus Allahyazadeh

[printed name of Applicant]



[signature of Applicant]

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**ORDER**

BE IT REMEMBERED on this day, there was presented to the Court the Motion for Admission Pro Hac Vice filed by Venus Allahyazadeh, counsel for \_\_\_\_\_, and the Court, having reviewed the motion, enters the following order:

IT IS ORDERED that the Motion for Admission Pro Hac Vice is GRANTED, and Venus Allahyazadeh may appear on behalf of \_\_\_\_\_ in the above case.

IT IS FURTHER ORDERED that Venus Allahyazadeh, if he/she has not already done so, shall immediately tender the amount of \$100.00, made payable to: **Clerk, U.S. District Court**, in compliance with Local Court Rule AT-1(f)(2).

SIGNED this the \_\_\_\_\_ day of October, 20 \_\_\_\_\_.  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE